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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JUAN FLORES-MENDEZ, an individual and
AMBER COLLINS, an individual, and on
behalf of classes of similarly situated
individuals,

Plaintiffs,

v.

ZOOSK, INC., a Delaware corporation,

Defendant.

Case No.: 3:20-cv-04929-WHA

**JOINT STIPULATION AND [PROPOSED]
ORDER TO CONTINUE CLASS
CERTIFICATION DEADLINES**

Judge: Hon. William Alsup

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Pursuant to Civil L.R. 6-2 and 7-12, this joint stipulation is entered into by and between Plaintiffs Juan Flores-Mendez and Amber Collins, and Defendant, Zoosk, Inc. (collectively, the “Parties”), subject to the approval of the Court.

WHEREAS, the parties have been working to complete discovery in this case pursuant to the Court’s deadlines; and

WHEREAS, Plaintiffs recently filed a motion to amend their operative complaint (“Motion to Amend”, Dkt. 95) to add further factual allegations to support their causes of action; and

WHEREAS, the pleadings have not yet been settled; and

WHEREAS, Plaintiffs have sought certain discovery that has been hindered due to the COVID-19 pandemic;

WHEREAS, the case schedule allows for some flexibility in the class certification briefing deadlines without moving any other deadlines in the case; and

WHEREAS, the Parties agree that in light of the progress to date on completing discovery an extension is warranted of Plaintiffs’ deadline to move for class certification; and

WHEREAS, the Parties agree that in light of Plaintiffs’ stated intention of supporting their class certification motion with expert evidence, a lengthening is warranted to the amount of time the Defendant currently has to prepare its papers in opposition to Plaintiffs’ class certification motion; and

WHEREAS, the scope of discovery may change depending on the Court’s ruling on the Motion to Amend, which motion Zoosk opposes; and

WHEREAS, the Parties agree to negotiate in good faith whether and to what extent another extension of the class certification briefing schedule, in addition to the extension agreed to by means of this Stipulation, may be needed after the Court has issued an order on the Motion to Amend;

NOW THEREFORE, the Parties agree, subject to the approval of the Court, to the following adjustment of the class certification briefing schedule in this case, which adjustment shall not affect any of the other currently operative dates and deadlines in this matter:

- The deadline for Plaintiffs to move for class certification, which is currently set on December 8, 2021 (Dkts. 60, 76), shall be extended by 45 days to January 24, 2022;

- The deadline for Defendant's opposition to Plaintiffs' motion for class certification, which is currently set on December 29, 2021, shall be extended to February 28, 2022;
- The deadline for Plaintiffs' reply to Defendant's opposition to Plaintiffs' motion for class certification, which is currently set on January 12, 2021, shall be extended to March 14, 2022;
- The hearing on Plaintiffs' motion for class certification shall be on March 28, 2022 or such later date as the Court's calendar may accommodate.

DATED: November 16, 2021

BRADLEY/GROMBACHER LLP

By: /s/ Kiley L. Grombacher

Kiley L. Grombacher
Attorney for Plaintiffs

DATED: November 16, 2021

**ORRICK HERRINGTON
& SUTCLIFFE, LLP**

By: /s/ Douglas H. Meal

Douglas H. Meal
Rebecca Harlow

E-SIGNATURE ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Kiley L. Grombacher, attest that concurrence in the filing of this document has been obtained.

Dated: November 16, 2021

By: /s/ Kiley L. Grombacher

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Case No.: 3:20-cv-04929-WHA

**[PROPOSED] ORDER TO CONTINUE
CLASS CERTIFICATION DEADLINES**

Judge: Hon. William Alsup

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that:

1. Plaintiffs' motion for class certification deadline is extended to January 24, 2022;
2. Defendant's response is due February 28, 2022;
3. Plaintiffs' reply is due March 14, 2022;
4. The hearing on Plaintiffs' motion for class certification is March 28, 2022.
5. All other scheduled dates and deadlines in this matter shall remain as currently provided by the Court's prior Orders.

IT IS SO ORDERED.

Dated: _____

THE HONORABLE WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE